

Fact Sheet



For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on September 22, 2010.

Permit Number: **R30-00300133-2010**

Application Received: **October 14, 2011**

Plant Identification Number: **03-54-00300133**

Permittee: **U.S. Department of the Treasury, Internal Revenue Service (IRS)**

Mailing Address: **250 Murall Drive, MS#2225, Kearneysville, WV 25430-5200**

Permit Action Number: *SM01* Revised: *April 25, 2012*

Physical Location: Kearneysville, Berkeley County, West Virginia
UTM Coordinates: 248.928 km Easting • 4365.127 km Northing • Zone 18
Directions: Take I-81 to WV. At Exit 12 (WV-45/Winchester Avenue/Charlestown) turn onto WV-45 Eastbound (Apple Harvest Drive). Drive for 2.0 miles until WV-45 Eastbound becomes WV-9 Eastbound (Charles Town Road). Drive for 3.7 miles on WV-9 Eastbound (Charles Town Road). Next turn onto Short Road and make immediate Left onto Murall Drive. Drive for 0.2 miles on Murall Drive to arrive at the site.

Facility Description

The U.S. Department of the Treasury, Internal Revenue Service (IRS) operates an Enterprise Computing Center in Kearneysville, WV, which is responsible for the processing of electronically submitted tax returns. This significant modification replaces the three (3) 5.25 MMBtu/hr boilers located in a Main Building with four (4) 5 MMBtu/hr boilers. The boilers provide space heating for each building. Each of these boilers operates using No. 2 Fuel Oil at a maximum design rate of 35.71 gallons per hour. This facility has a Standard Industrial Classification (SIC) Code of 9311 and North American Industry Classification System (NAICS) Code of 92113. The facility has the potential to operate seven (7) days per week, twenty-four (24) hours per day.

Emissions Summary

The following table lists the permitted emissions associated with proposed changes:

Pollutant	Current Limits for 3 5.25mmBtu/hr Boilers (TPY)	Proposed Limits for 4 5mmBtu/hr Boilers (TPY)	Net Increase (TPY)
PM/PM ₁₀ /PM _{2.5} Filterable	0.99	1.24	0.25
Condensable PM	-	0.88	0.88
SO ₂	13.99	17.7	3.71
NO _x	11.82	12.44	0.62
CO	2.46	16.64	14.18

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 152.4 tons per year of NO_x. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, the U.S. Department of the Treasury, Internal Revenue Service (IRS), Enterprise Computing Center is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	PM limits
	45CSR13	Construction Permits
	45CSR30	Operating permit requirement
	45CSR34	HAPs emissions standard
	40 CFR part 63, subpart ZZZZ	Area source MACT for emergency engines
	40 CFR part 63, subpart JJJJJ	Area Source MACT for boilers

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2787A	February 1, 2012	
R13-2788	February 13, 2009	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently

enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit.

Determinations and Justifications

The equipment table was revised to note that the three (3) existing 5.25 MMBtu/hr boilers will be removed and the four (4) new 5 MMBtu/hr boilers were added. The existing boilers will not be immediately removed, therefore Condition 4.1.11. was added for the visible emissions standard from 45CSR2.

Conditions 3.1.9. and 3.5.10. were removed because the State Rule for Greenhouse Gases, 45CSR42 is in the process of being repealed.

Section 4.0. was revised to incorporate the changes made in R13-2787A, issued on February 1, 2012 and includes the following determinations:

The maximum design heat input (MDHI) rate of the new boilers is 5 MMBtu/hr. In accordance with 45CSR§2-11.1, the boilers are exempt from 45CSR2, Sections 4 (PM weight emission standards), 5 (fugitive PM), 6 (Registration requirements), 8 (Testing, monitoring, recordkeeping, and recording), and 9 (startups, shutdowns, and malfunction requirements). However, the boilers must comply with the 10% opacity standard of 45CSR§2-3.1. Existing condition 4.2.2. of the Title V permit requires monthly visible emission checks to demonstrate compliance with the opacity standard, and this condition was determined to be satisfactory to establish compliance. In accordance with 45CSR§10-10.1., the boilers are exempt from 45CSR10, Sections 3 (SO₂ weight emission standards), 6 (Registration requirements), 7 (Permit requirements), and 8 (Testing, monitoring, recordkeeping, and recording). The emission limits in Table 4.1.1.a. represent the maximum potential emissions from the boilers at the maximum fuel throughput at 8760 hours per year. Since the boilers are used for heating purposes, they will not be operated for 8760 hours per year, therefore compliance will be demonstrated by monitoring fuel usage on an annual basis. USEPA does not recognize this as a federally enforceable limit, therefore this condition was labeled as state-enforceable only.

R13-2787, Conditions 4.1.3., 4.4.2., and 4.4.3. were not carried over into the Title V permit since there are no control devices at this facility.

40 CFR part 63, subpart JJJJJ. The new and existing boilers at the Enterprise Computing Center have a maximum heat input of less than 10 MMBtu/hr and are therefore only subject to the work practices of §63.11223, which requires biennial boiler tune-ups for each unit (Condition 4.1.1.c.) Because the heat input of these units is less than 10 MMBtu/hr, the facility is not subject to the energy assessment requirements of §63.11214(c).

40 CFR part 63, subpart ZZZZ. The facility, designated as an area source of HAPs, has 15 emergency CI engines/generators that must comply with the requirements of 40 CFR part 63, subpart ZZZZ by May 3, 2013. Since the permit is not due for renewal until September 2015, a reopening of the permit to incorporate the RICE MACT requirements would be required in accordance with 45CSR§30-6.6.a.1. To avoid the reopening, this significant modification includes the RICE MACT requirements. The applicable requirements have been added as Conditions 4.1.9., 4.1.10., 4.2.3., 4.4.5. 4.5.3., 4.5.4., and 4.5.5.

Non-Applicability Determinations

40 CFR 64 – The new boilers do not have control devices and are therefore not subject to CAM in accordance with 40 CFR § 64.2(a).

Greenhouse Gas Permitting - This modification does not trigger a PSD permit and total CO₂ emissions from the new boilers are well below the threshold of 75,000 tpy, therefore, there are no applicable GHG requirements.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: March 6, 2012

Ending Date: April 5, 2012

All written comments should be addressed to the following individual and office:

Bobbie Scroggie
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Bobbie Scroggie
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478

Response to Comments

USEPA Comments: (1) The Fact Sheet emissions summary needs to account for GHGs. (2) The USEPA address needs to be updated. (3) The existing boilers will not be removed immediately, so they need to be included in the equipment table and the opacity requirement needs to be included in the permit. (4) New boilers emissions limits cannot be recognized as federally enforceable if compliance is based on once per year fuel usage.

DAQ's response: (1) Revised the Fact Sheet to account for GHGs. (2) Revised the USEPA address in the permit. (3) Removed the strikeout for the existing boilers in the equipment table and noted that they are "to be removed". Reinstated the opacity requirement and visible emissions checks for the existing boilers. (4) Noted that the emissions limits for the new boilers are state-enforceable only as requested by USEPA.